

**INCORPORATING:**  
AUSTRALIAN ACUPUNCTURE  
ASSOCIATION  
ACUPUNCTURE ETHICS &  
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24 October 2012

Consultations  
Podiatry Board of Australia  
[podiatryconsultation@ahpra.gov.au](mailto:podiatryconsultation@ahpra.gov.au)

**Re: Proposed options in relation to acupuncture for the podiatry profession**

Thank you for providing the opportunity to comment on the *Public consultation paper – Proposed options in relation to acupuncture for the podiatry profession*.

The Australian Acupuncture and Chinese Medicine Association Ltd (AACMA) is the peak professional body of qualified practitioners of acupuncture, Chinese herbal medicine, and Chinese herbal dispensing.

We wish to commend the Podiatry Board of Australia for setting out unambiguous and well-considered options for acupuncture for the podiatry profession.

**Preferred Option – Option 2**

The AACMA supports Option 2 – Not develop podiatry specific Accreditation Standards and Registration Standard for endorsement for acupuncture.

The proposed alternative process outlined under Option 2 is the most appropriate pathway for podiatrists wishing to use the title ‘acupuncturist’. This ensures that all registered practitioners using the title ‘acupuncturist’ have met the same minimum standard and the public is not confused by ‘different standards for different professions’ in relation to acupuncture.

Existing podiatrists who may not hold an appropriate qualification in acupuncture may apply to be registered as an acupuncturist with the Chinese Medicine Board of Australia (CMBA) under the CMBA Grandparenting registration standard that operates until 30 June 2015.

**Comment on Option 1**

Option 1 is expensive, resource intensive and, in our view, not a part of the core functions of any national board, other than the CMBA. It would result in unnecessary duplication of functions with the CMBA, take resources away from the Podiatry Board’s core functions, and potentially result in a standard that is significantly different from the CMBA registration and accreditation standards for acupuncture.


In our view, the most likely outcome of Option 1 would be an accreditation standard in acupuncture inferior to the CMBA accreditation standard. If that eventuated, it may be considered that the interests of a profession in having a 'boutique' acupuncture accreditation standard prevailed over the primary purpose of national registration to protect public health and safety.

### **Summary**

We strongly recommend that the Podiatry Board of Australia decides on Option 2. We believe it is the better option. It would not distract the Podiatry Board from the more important business of regulating the profession of podiatry. Podiatrists who also practise in the profession of Chinese medicine and wish to use the protected title 'acupuncturist', should be required to register with the CMBA in the Division of Acupuncture. To act otherwise would be contrary to the primary purposes of the National Registration and Accreditation Scheme for the Health Professions and the National Law.

Please contact me at the AACMA national office on 07 3324 2599 ext 13 if you wish to discuss the content of this submission.

Yours faithfully

A black rectangular redaction box covering the signature of Judy James.

**Judy James**  
**AACMA CEO**